

REMARKS

Claims 1- 20 were initially presented. With this response, Claims 1 and 11 have been amended, no claims have been cancelled and no claims have been newly added so that Claims 1-20 are pending after this response. Reconsideration is respectfully requested.

PRIOR ART REJECTIONS

In response to the Examiner's rejection of Claims 1-20 as being anticipated under 35 USC 102(b) by the "Advanced Khoros Home Manuals" (hereinafter "Khoros Manual"), Applicant respectfully traverses the rejection. In particular, the Khoros Manual does not anticipate or render obvious the present claims for the reasons set forth below and early allowance of the claims is respectfully requested.

Claim 1 is not anticipated by the Khoros Manual. In particular, Claim 1 recites "a base operator configured to interface with one or more derivative operator classes, each operator class including an operator object for executing a processing function on the image or image-derived data." In the rejection, the Examiner points to a portion of the Khoros Manual on page 3 that discusses that the data services store data inside of an abstract data object to support the argument that the Khoros Manual discloses the claimed base operator with the operator object. Page 3 of the Khoros Manual discusses the Khoros data models and the fact that data is stored within an abstract data object. Then, "Data Services present the data inside of this data object to the operators in the form of a data model." Thus, the data services store data that is then operated on by the operators. The data services in the Khoros Manual do not contain the claimed "operator class including an operator object for executing a processing function on the image or image-derived data" as the data services in the Khoros Manual contain only data.

The Khoros Manual does describe a polymorphic data model and a polymorphic operator wherein the polymorphic data model has five segments of data including a value, location, time, mask and map segment as shown in page 4 of the Khoros Manual. The polymorphic data model in

the Khoros Manual thus stores data with the different segments described on page 5 of the Khoros Manual. The polymorphic operator “processes the segments of the data model that an object contains differently.” See page 7 of the Khoros Manual. The Khoros Manual discusses the polymorphic operators with multiple inputs that operate on the polymorphic data models. The examiner has cited to this “Behavior of Polymorphic Operators” section to support the argument that the Khoros Manual discloses the claimed “base multiport node class configured to provide a multiport node for each operator object, each multiport node instantiating a pluggable operator for connecting the multiport nodes together at runtime according to user-defined parameters, and wherein the connection of multiport nodes implements the processing functions of the operator objects to execute the application.” However, the polymorphic operator in the Khoros Manual does not provide a multiport node for each operator object and does not instantiate a pluggable operator that connects the multiport nodes together at runtime. Furthermore, the Khoros Manual does not disclose that “the connection of multiport nodes implements the processing functions of the operator objects to execute the application.” Therefore, Claim 1 is allowable over the Khoros Manual. Claim 11 is also allowable over the Khoros Manual for at least the same reasons as Claim 1.

In the Application of:
W. Scott Callaway et al.
Application No.: 09/766,390
Filed: January 19, 2001
Page 7

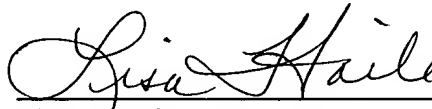
PATENT
Attorney Docket No. BECK1220-2

Furthermore, the dependent claims are allowable over the Khoros Manual for at least the same reasons as the independent claims.

Enclosed is a check in the amount of \$420.00 for the Two (2) Month Extension of Time fee. The Commissioner is hereby authorized to charge any other fees associated with the filing submitted herewith, or credit any overpayment, to Deposit Account No. 50-1355. A copy of this sheet is enclosed.

Respectfully submitted,

Date: September 1, 2004



Lisa A. Haile, J.D., Ph.D.
Registration No.: 38,347
Telephone: (858) 677-1456
Facsimile: (858) 677-1465

GRAY CARY WARE & FREIDENRICH LLP
4365 Executive Drive, Suite 1100
San Diego, California 92121-2133
CUSTOMER No. 28213

RECEIVED

SEP 14 2004